

BARCLAY DAMON LLP

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Counsel to Debtors and Debtors-in-Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
	:	
ST. CHRISTOPHERS, INC., <i>et al.</i> , ¹	:	Case No. 24-22373 (SHL)
	:	Main Case
Debtors.	:	Jointly Administered

**CERTIFICATE OF NO OBJECTION REGARDING DEBTORS' MOTION
FOR ENTRY OF AN ORDER AUTHORIZING DEBTORS TO REJECT
CERTAIN EXECUTORY CONTRACTS RELATED TO THE HEALTH
HOMES BUSINESS, NUNC PRO TUNC TO NOVEMBER 25, 2024**

Under Rule 9013-3 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York (the "Local Rules"), the undersigned counsel for the Debtors hereby certifies as follows:

1. On November 25, 2024, Barclay Damon LLP, as counsel for the Debtors, filed the *Debtors' Motion for Entry of Order Authorizing Debtors to Reject Certain Executory Contracts Related to the Health Homes Business, Nunc Pro Tunc to November 25, 2024* [Docket No. 185] (the "Motion").

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: St. Christopher's, Inc. (0485) and The McQuade Foundation (2652) (collectively, the "Debtors").

2. Objections or responses to the Motion were due no later than 4:00 p.m. on December 31, 2024, (prevailing Eastern Standard Time) (the “Objection Deadline”). Local Rule 9013-3 provides that a motion may be granted without a hearing if (a) no objection, responsive pleading, or request for hearing have been filed or served on or before the applicable objection deadline, (b) a certificate of no objection was filed according to the Local Rules and (c) the attorney for the entity that filed the motion or application complies with such rule.

3. The Motion with Notice thereof was filed on November 25, 2024 [Docket No. 185]. The Affidavit of Service evidencing service of the Motion with Notice on November 25, 2024, was filed on November 26, 2024 [Docket No. 186].

4. As of the filing of this certificate, more than forty-eight (48) hours have elapsed since the Objection Deadline and, to the best of my knowledge, no objection, responsive pleading, or request for hearing with respect to the Motion has been (a) filed with the Court on the docket of the above-captioned cases or (b) served on the Debtors or their counsel.

5. Accordingly, the Debtors respectfully request entry of the proposed order granting the relief requested in the Motion, attached hereto as **Exhibit A** (the “Proposed Order”), at the Court’s earliest convenience. If not entered prior to the hearing, the Debtors will seek entry of the Proposed Order at the hearing scheduled for 10:00 a.m., prevailing Eastern Standard Time, on January 7, 2025, before the Honorable Sean H. Lane, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601.

6. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: January 3, 2025
New York, New York

BARCLAY DAMON LLP

By: /s/Scott L. Fleischer
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Exhibit A
Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
	:	
ST. CHRISTOPHERS, INC., <i>et al.</i> , ¹	:	Case No. 24-22373 (SHL)
	:	Main Case
Debtors.	:	Jointly Administered

**ORDER AUTHORIZING DEBTORS TO REJECT CERTAIN
EXECUTORY CONTRACTS RELATED TO THE HEALTH HOMES
BUSINESS, *NUNC PRO TUNC* TO NOVEMBER 25, 2024**

Upon the motion (the “Motion”)² of St. Christopher’s, Inc. and The McQuade Foundation, debtors and debtors in possession (collectively, the “Debtors”) for entry of an order (this “Order”), pursuant to sections 365(a) and 105(a) of the Bankruptcy Code, Bankruptcy Rule 6006, and Local Rule 6006-1, authorizing rejection *nunc pro tunc* to November 25, 2024 of certain executory contracts identified in **Exhibit B** attached to the Motion, all as set forth more fully in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, C.J.); and consideration of the Motion and the relief requested therein being a core proceeding under 28 U.S.C. § 157(b); and venue being proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided to the Notice Parties set forth in the Motion, and it appearing that no other or further notice need be provided; and no objections or responses having been filed to the Motion; and the Court having reviewed the Motion and considered the relief requested in the Motion; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: St. Christopher’s, Inc. (0485) and The McQuade Foundation (2652).

² Each capitalized term used herein but not otherwise defined herein shall have the meaning ascribed to it in the Motion.

granted herein; and the Court having determined the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors, and all parties in interest; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The relief requested in the Motion is hereby granted as set forth herein.
2. Pursuant to sections 365 and 105 of the Bankruptcy Code, Bankruptcy Rule 6006, and Local Rule 6006-1, and subject to the terms of this Order, each of the executory contracts identified in **Exhibit B** to the Motion is hereby rejected, effective *nunc pro tunc* to November 25, 2024.
3. Claims arising out of any rejection effected pursuant to this Order must be filed by the date that is thirty (30) days after entry of this Order.
4. Nothing in this Order or the Motion shall be construed as prejudicing the rights of the Debtors to dispute or contest the amount of or basis for any claims against the Debtors in connection with any claims arising out of any rejection effectuated pursuant to this order.
5. To the extent necessary, the automatic stay provided by section 362 of the Bankruptcy Code is hereby modified as to the Debtors to allow the parties to effectuate the provisions of this Order.
6. The notice procedures set forth in the Motion are good and sufficient notice and satisfy Bankruptcy Rules 2002(a), 6006, 6007, and 9014 by providing the counterparties with notice and an opportunity to object and be heard at a hearing.
7. The Debtors are authorized to take all such actions as are necessary or appropriate to implement the terms of this Order.

8. The Court shall retain exclusive jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: January __, 2025
New York, New York

Honorable Sean H. Lane
United States Bankruptcy Judge